

Exhibit C

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, *et al.*

Plaintiffs,

V.

GREG ABBOTT, *et al.*,

Defendants.

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Case No. 3:21-cv-00259
[Lead Case]

TEXAS STATE CONFERENCE OF THE
NAACP,

Plaintiff,

V.

GREG ABBOTT, *et al.*,

Defendants.

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Case No. 1:21-cv-01006
[Consolidated Case]

DECLARATION OF SOFIA FERNANDEZ GOLD

I, Sofia Fernandez Gold, upon my personal knowledge, hereby submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am Associate Counsel at the Lawyers' Committee for Civil Rights Under Law. I have served as Associate Counsel for over eight months.

2. As part of my responsibilities, I assisted with drafting Texas NAACP's First Amended Complaint, in response to this Court's May 23, 2022 Memorandum Opinion (ECF No. 307). The Memorandum Opinion granted Texas NAACP two weeks to file an amended complaint in order to, among other things, establish Article III standing by naming Texas NAACP members who reside in challenged districts. Mem. Op. at 14.

3. To respond to the Memorandum Opinion, Texas NAACP worked diligently to identify members who reside and vote in each of the challenged districts and who granted Texas NAACP permission to use their names in the First Amended Complaint under seal. This task was time consuming and difficult, because numerous members did not feel comfortable being named in the complaint, even if it was filed under seal. After considerable and diligent outreach, Texas NAACP identified 50 members who reside in each of the challenged districts.

4. When Texas NAACP filed the complaint on June 7, 2022, however, the identified member who resides and votes in the enacted HD 57 was inadvertently omitted. This member was identified on or before June 3, 2022.

5. Texas NAACP's counsel was not aware of its inadvertent omission until after it reviewed Defendants' Motion to Dismiss NAACP's Complaint (ECF No. 402).

6. On July 18, Counsel for Texas NAACP notified Counsel for Defendants of its inadvertent omission, and sought consent to identify that member in its filing of the complaint under seal on July 22, in accordance with the Court's July 18 order on the various motions to seal. *See* Order Mot. to Seal (ECF 439). Counsel for Defendants declined on July 20 without explanation.

Executed on July 25, 2022 in Washington, D.C.

/s/ Sofia Fernandez Gold
Sofia Fernandez Gold